

Request	Objection	Summa's Response to Objection
	General Objections	Please be advised that we do not accept the "general objections" which, in any event, do not comport with the Federal Rules of Civil Procedure. Please confirm that no documents are being withheld based on the general objections.
	Privilege asserted generally	The objections are not well taken and no privilege log has been supplied.
1. All tax returns (state, local and federal) of Boaz Bagbag for 2016, 2017, 2018, 2019, and 2020.	Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.	<p>Are you asserting that Mr. Bagbag already has produced his tax returns for each of the years 2016 to 2020?</p> <p>Are you asserting that he produced his tax returns for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the tax returns for a particular year were previously produced. At a minimum, Mr. Bagbag must produce his tax returns for years that were not previously produced. In addition, even if he did produce certain year's returns before, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>

<p>2. All paychecks, paystubs, W-2s, 1099's, and/or K-1's Boaz Bagbag received, from any source, in 2016, 2017, 2018, 2019, and/or 2020.</p>	<p>Defendant will produce non-privileged responsive documents, if any such documents exist.</p>	<p>I am at a loss to see how the documents requested could be privileged. Please produce all requested documents.</p>
<p>3. Documents sufficient to identify any ownership interest of Boaz Bagbag in any entity, currently and/or during the years 2016, 2017, 2018, 2019, and/or 2020.</p>	<p>Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced. At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>

<p>4. All documents, including but not limited to statements and copies of canceled checks, for any and all accounts maintained at any bank, brokerage or other financial services entity, in the name of Boaz Bagbag, jointly or alone, from January 1, 2016 to date.</p>	<p>Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021?</p> <p>Are you asserting that he produced such documents for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again.</p> <p>Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
<p>5. All credit card statements for credit cards: (a) in the name of Boaz Bagbag; and/or (b) used by or for the benefit of Boaz Bagbag.</p>	<p>Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021?</p> <p>Are you asserting that he produced such documents for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced. At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again.</p>

	Defendant.	<p>Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
<p>6. All financial statements, profit and loss statements, balance and income statements, balance sheets, ledgers, journals, accounting statements, accounting reports or other documents designed or intended to present the financial condition of Boaz Bagbag in calendar years 2016 to date.</p>	<p>Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced. At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
<p>7. Documents sufficient to identify (name, address, phone number, email address) of any accounting who/which provided services to Boaz</p>	<p>Defendant will produce non-privileged responsive documents,</p>	<p>This request should have asked for an information about any accountant, not any accounting. Please confirm that you read the request as seeking</p>

Bagbag in calendar years 2016 to date.	if any such documents exist.	information about an accountant(s).
8. All documents concerning any motor vehicles, boats or aircraft in which Boaz Bagbag has any interest.	Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
9. A copy of Boaz Bagbag's driver's license.	Defendant objects to this Request as propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.	<p>The objection is not well-taken. Summa Capital is entitled to know the address shown on Mr. Bagbag's driver's license.</p> <p>Please withdraw the objection.</p>
10. A copy of Boaz Bagbag's current passport.	Defendant objects to this Request as propounded for the improper purposes	The objection is not well-taken. Summa Capital is entitled to know if Mr. Bagbag has been travelling internationally so it can question him about such travel, including the cost of such travel (and related expenses)

	of annoying, harassing, oppressing, or unduly burdening Defendant.	and the source of funds to pay for such travel. Please withdraw the objection.
15. All bills rendered by Pollock Cohen LLP for services rendered to or for the benefit of Boaz Bagbag during 2016 to date, including but not limited to services rendered in Adversary Proceeding 19-1022 and/or Adversary Proceeding 20-01185.	Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again.</p> <p>Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>

<p>16. Copies of all checks issued to Pollock Cohen LLP by Boaz Bagbag or for his benefit.</p>	<p>Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced. At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
<p>17. All bills rendered by any other attorney(s) for services rendered to or for the benefit of Boaz Bagbag during 2016 to date.</p>	<p>Defendant objects to this Request as unreasonably repetitive, cumulative and duplicative, overbroad, unduly burdensome, oppressive, and propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced. At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p>

	Defendant.	<p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
18. Copies of all checks issued to any attorney(s) for services rendered to Boaz Bagbag or for his benefit during 2016 to date.	Defendant objects to this Request as unreasonably repetitive, cumulative and duplicative, overbroad, unduly burdensome, oppressive, and propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced. At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
20. All documents concerning, referring to or relating to any real property owned by Boaz Bagbag, individually, jointly, as tenants in common, as tenants by the entirety, or through any person or entity, from January 1, 2016 to	Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence</p>

date.	requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.	<p>that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again.</p> <p>Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
22. All documents concerning, referring to or relating to any real property leased or rented by or to Boaz Bagbag, jointly or alone, from January 1, 2016 to date.	Defendant will produce non-privileged responsive documents, if any such documents exist.	
24. All documents, books, and records referring or relating to corporations in which Boaz Bagbag, is presently, or was at any time since January 1, 2016, a shareholder, officer, director or employee.	Defendant objects to this Request as overbroad, unduly burdensome, oppressive, and propounded for the improper purposes of annoying, harassing, oppressing, and unduly burdening Defendant.	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021?</p> <p>Are you asserting that he produced such documents for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again.</p> <p>Accordingly, we ask that you withdraw the objection.</p>

		<p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
<p>25. All documents, books, and records referring or relating to limited liability companies in which Boaz Bagbag, is presently, or was at any time since January 1, 2016, a member, officer, manager or employee, including but not limited to operating agreements, bank statements and Schedule K-1's.</p>	<p>Defendant objects to this Request as overbroad, unduly burdensome, oppressive, and propounded for the improper purposes of annoying, harassing, oppressing, and unduly burdening Defendant.</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced. At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
<p>26. All documents, books, and records referring or relating to partnerships, limited partnerships, or joint ventures in which Boaz Bagbag, is presently, or was at any time since January 1, 2016, a partner, limited partner, general partner,</p>	<p>Defendant objects to this Request as overbroad, unduly burdensome, oppressive, and</p>	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021? Are you asserting that he produced such documents for any of those years? If you are asserting either fact, please provide evidence</p>

officer, manager or employee.	propounded for the improper purposes of annoying, harassing, oppressing, and unduly burdening Defendant.	<p>that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>
27. All other books, papers and records in your possession or control which have or may contain information concerning the property, income or other means relevant to the satisfaction of the judgment	Defendant objects this Request as vague, ambiguous, unreasonably repetitive, cumulative or duplicative, overbroad, unduly burdensome, oppressive, and as propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant.	<p>Are you asserting that Mr. Bagbag already has produced all documents requested, including for years 2016 to 2021?</p> <p>Are you asserting that he produced such documents for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again. Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor</p>

		has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.
28. All documents concerning monetary obligations owed to Boaz Bagbag by any person, firm or entity.	Defendant objects to this Request as repetitive, cumulative, and duplicative of prior discovery requests, and therefore propounded for the improper purposes of annoying, harassing, oppressing, or unduly burdening Defendant	<p>Are you asserting that Mr. Bagbag already has produced all documents requested for 2016 to 2021?</p> <p>Are you asserting that he produced such documents for any of those years?</p> <p>If you are asserting either fact, please provide evidence that the documents for a particular year were previously produced.</p> <p>At a minimum, Mr. Bagbag must produce these documents for years that were not previously produced. In addition, even if he did produce documents for a requested year, it hardly would be burdensome for him to produce them again.</p> <p>Accordingly, we ask that you withdraw the objection.</p> <p><u>Further Statement:</u></p> <p>We have been advised that the only documents Debtor has produced are a few pages of bank statements from 2018 and a small number of credit card statements from 2019.</p>